

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRUE RETURN SYSTEMS LLC,

Plaintiff,

v.

COMPOUND PROTOCOL,

Defendant.

Case No. 1-22-cv-08483-JPC

**DECLARATION OF JACK FONSS IN SUPPORT OF
PLAINTIFF'S EX PARTE MOTION FOR LEAVE TO SERVE
DEFENDANT COMPOUND PROTOCOL BY ELECTRONIC
MEANS**

I, Jack Fonss, declare as follows:

1. I am over the age of 18 and am the owner of True Return Systems, LLC, the Plaintiff in this action.
2. I make this declaration based upon personal knowledge, and I could and would competently testify to the facts stated herein if called to do so.
3. In approximately September 2022, I performed a series of searches to identify entities or individuals to whom the Summons and Complaint in this action could be directed.
4. In that time frame, I conducted a good faith search of public resources in an attempt to identify any mailing address for Defendant, any registered agent for service of process, or any corporate officer. I was unable to identify any such information.
5. As part of this research, I searched the Compound Protocol website (<https://compound.finance/>), the Compound Protocol public documentation (<https://docs.compound.finance/>), and the Compound Protocol Forum (<https://www.comp.xyz/>).

I also searched the Compound Protocol repository on GitHub (<https://github.com/compound-finance>), and Twitter to identify the locations of individuals to which the Summons and Complaint could be directed. I did not identify any such individuals.

6. I further searched for business registrations throughout the U.S. under the names “Compound”, “Compound Finance”, and “COMP” which is the securities ticker for Compound Protocol’s minted cryptocurrency and ownership interests. I did not find any business registration in the United States.

7. The Compound Protocol website (<https://compound.finance/>) contains no contact address, no identification of management, no telephone number, and no conventional point of contact. The WHOIS entry for this website does not contain any unredacted information about the operator of the website.


8. I believe that my search efforts constituted a good faith effort to identify this information.

9. I have studied the Compound Protocol website (<https://compound.finance/>) and confirm that that site links to the @compoundfinance Twitter account and the official Compound Protocol forum at compound.finance. Indirectly linked to Compound Protocol’s site, documentation relating to security and bug bounties also provides an email address for communication, security@compound.finance.

10. I observed the Compound Protocol Forum during the September 2022 time period and observed that the Forum adds multiple contributions and posts a week, and all historical posts are readily searchable.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 1st day of February 2023.



Jack Fonss